RM 11E Upland Site Status
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Kristine,

As we discussed in our phone conference on April 6th, the following is an update on the status of upland sites in the RM 11E area. I'm still working on organizing a package of historical information on Albina Engine and Machine Works (succeeded by the DIL Trust), but it's a bit more complicated than I thought it would be and will take some more time. Their 104(e) package was pretty slim, as I'm sure you are aware. Have they submitted any updates?

Based on the City's coordination with DEQ and efforts to track Cleanup Program progress at sites in and adjacent to City basins, here are brief summaries on several sites in the RM 11E area.

- Pacificorp- Albina Riverlots (ECSI 5117) Knott St. Substation: This ECSI number covers current and historical properties in the Albina area, as well as the Knott St. Substation. The site was within Basin 44A, until the 2011 CSO diversion sent this drainage area to the tunnel. At Knott St., Pacificorp prepared a Preliminary Assessment, collected some onsite solids data, closed a UIC, and installed a new onsite infiltration system to capture/treat stormwater that may have flowed overland historically to inlets draining to OF 44A. Our source investigation around the Knott St. substation did not indicate that the site was a major current source (no piped connections to City system) and now that this portion of Basin 44A has been diverted to the treatment plant there is no pathway to the river. Groundwater was not looked at, but distance from river and relatively low soil numbers didn't support pushing that pathway. DEQ has not written an SCD/NFA for the site, but likely will soon. Because this is under the same ECSI as the Albina Substation, they may be waiting for work to conclude at Albina.
- Pacificorp- Albina Riverlots (ECSI 5117) Albina St. Substation: Current Albina area properties are within Basin 44. Historical properties connected to Basin 43 and 44. Pacificorp prepared a Preliminary Assessment that covered historical and current properties. When the investigation moved forward, Pacificorp did not conduct any onsite work on the historical parcels. At currently owned properties, stormwater and inline solids data collected by the City identified the substation as a current source to OF 44. Pacificorp completed an extensive evaluation of perimeter soils (i.e., in the vegetated strips surrounding the properties) and concluded that onsite and offsite soil removals were needed to address PCBs in erodible surface soils. Sampling was not conducted to characterize the substation -- just the areas with potential overland runoff or stormwater discharge to OF 44. Soil removals on site and in City rights-of-way were completed in 2010, including filling excavated areas with clean gravel and installing berms in areas of the substation perimeter where overland flows had been observed. Pacificorp's initial objective was to remove the stormwater pathway from the active substation to OF 44; however, they later determined that they were unable to abandon the one onsite catch basin due to flooding. Overland discharge to OF 44 appears to have been controlled. Pacificorp just completed 3 rounds of stormwater data collection in the City system to verify that the source controls they implemented on site are sufficient. Other work completed includes cleaning the City lines and catch basins adjacent to the substation and video surveying the adjacent lines to confirm that there were not other active connections and to assess the potential groundwater infiltration pathway. Pacificorp did not collect site groundwater data and did not evaluate infiltration to the section of line between N. River St. and the outfall, the segment that the City stated was most likely to be impacted by site groundwater. Very little soil data has been collected from areas of the site where contamination is most likely to be present (e.g., transformer banks). Current status is that Pacificorp is writing their final Source Control Evaluation report in hopes of acquiring a Source Control Decision (NFA?) from DEQ soon.
- Glacier (ECSI 5449): The site historically connected to OF 44. At the outset of their work under the DEQ

Cleanup Program they disconnected the one lateral to OF 44 and rerouted it to one of their private outfalls. For the source control evaluation, Glacier collected solids data from various points on their onsite conveyance system. The data didn't indicate much in the way of onsite contaminant source areas. They are currently collecting stormwater data. DEQ commented that Glacier needed to consider the bank and groundwater pathways. Glacier disagreed and it appears that those pathways have not been evaluated. Current status: limited data, more stormwater data to come, but we don't expect the upland data to indicate that the site is a current major source via the stormwater pathway. Future of bank and groundwater work is unknown and may hinge on whether the site is seeking an NFA or just a stormwater Source Control Decision.

- Cargill (ECSI 5561): This site does not have piped connections to City systems, at least as far as we know. The property includes an historical shipway. Site approach was similar to Glacier's: storm system solids followed by stormwater. Data we have seen thus far don't indicate that the site is a major current source via the stormwater pathway. DEQ raised the same issues regarding the bank and groundwater. Cargill also pushed back and requested that DEQ observe the nature of the bank, contending that there were no erodible soils in the bank. We don't know where DEQ stands on the need to pursue the bank and groundwater pathways. This one may also be determined by the nature of the decision -- Source Control Decision vs. NFA. According to DEQ's comment letter from January 2012, they were satisfied with the catch basin sediment sampling report and will wait for stormwater results collected under the new NPDES permit effective July 1, 2012. DEQ stated that they will evaluate the groundwater pathway and erosion of riverbank soils as "a prelude to an SCD."
- Generally, for the Glacier and Cargill sites, current operations may not be a significant source of contaminants to river via the stormwater pathway, but both sites may have legacy contamination onsite that could reach the river through current pathways (e.g. bank erosion, overwater activities, groundwater) or if site soils are disturbed.
- Generally, for the PacifiCorp Albina Riverlots site, contaminated erodible soils at and adjacent to the site were likely from historical releases at the property and had a complete pathway to the river through the stormwater collection system. Historically, PacifiCorp owned and operated at a number of properties in this drainage area.

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